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February 6, 2006

**Electronic Submission**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: PLDT (US) Ltd. Certification of CPNI Filing (February 6, 2006),  
EB Docket No. 06-36, EB-06-TC-060**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notices issued January 30, 2006 and February 2, 2006 in the above-captioned proceedings,<sup>1</sup> PLDT (US) Ltd. hereby submits the attached CPNI certification and compliance statement.

Please do not hesitate to address any questions to the undersigned.

Respectfully submitted,



Joseph A. Godles  
Devendra T. Kumar  
*Counsel to PLDT (US) Ltd.*

cc: Byron McCoy


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<sup>1</sup> Public Notice, "Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications," DA 06-223 (Jan. 30, 2006); Public Notice, "Enforcement Bureau Opens New Docket for the February 6, 2006, Filing of CPNI Compliance Certifications," DA 06-258 (Feb. 2, 2006).

**ANNUAL CPNI COMPLIANCE CERTIFICATE AS REQUIRED BY SECTION  
64.2009(e) OF THE FCC'S RULES**

The undersigned attests and certifies as follows:

1. I am an officer of PLDT (US) Ltd. ("PLDT US").
2. I have personal knowledge that PLDT US has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information ("CPNI") rules established by the Federal Communications Commission (*i.e.*, 47 C.F.R., Part 64, Subpart U).
3. The attached statement provides further information regarding PLDT US's operating procedures and how they ensure that PLDT US complies with the Commission's CPNI rules (*i.e.*, 47 C.F.R., Part 64, Subpart U).

  
\_\_\_\_\_  
(Signature)

EVARISTO OCAMPO  
\_\_\_\_\_  
(Printed Name)

PRESIDENT  
\_\_\_\_\_  
(Title)

Feb 6, 2006  
\_\_\_\_\_  
(Date)

**ANNUAL CPNI COMPLIANCE STATEMENT AS REQUIRED BY SECTION  
64.2009(e) OF THE FCC'S RULES**

The following statement explains how operating procedures followed by PLDT (US) Ltd. ("PLDT US") ensure that it complies with the Customer Proprietary Network Information ("CPNI") rules established by the Federal Communications Commission (*i.e.*, 47 C.F.R., Part 64, Subpart U).

To the extent PLDT US has access to CPNI as defined by Section 222(h)(1) of the Communications Act,<sup>1</sup> it does not use CPNI for marketing or any other purpose prohibited or otherwise limited by the Commission's CPNI rules. In fact, PLDT US does not engage in any marketing activities within the United States. In addition, PLDT US does not share any CPNI information with any third parties, including any affiliates, joint venture partners, or contractors, except in accordance with the Commission's rules.<sup>2</sup>

PLDT US employees are informed of the appropriate use of CPNI, and are subject to disciplinary action for any violations.

Because PLDT US does not use CPNI and does not engage in any marketing activities in the United States, it does not presently (1) have in place a system by which the status of a customer's CPNI approval can be clearly established (no approval is sought because the CPNI is not used), (2) maintain a record of its sales and marketing campaigns that use its customers' CPNI (there are no such campaigns), and (3) have in place a supervisory review process with respect to outbound marketing situations (there is no outbound marketing). However, PLDT US stands ready to comply with these provisions of the Commission's CPNI rules should it begin using CPNI for marketing or other purposes not permitted by the rules.

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<sup>1</sup> The only services offered by PLDT US in the United States are international private line services between the United States and the Philippines.

<sup>2</sup> The only third party with whom PLDT US may share CPNI in certain instances is its parent company, Philippine Long Distance Telephone Company ("PLDT").